

DOCKET COPY ORIGINAL

HOWARD & HOWARD
ATTORNEYS
Established 1869

REC'D

SEP 14 1993

FCC-MAIL ROOM

The Pinehurst Office Center, Suite 250
1400 North Woodward Avenue
Bloomfield Hills, Michigan 48304

Telephone (313) 645-1483
Fax (313) 645-1568

The Kalamazoo Building, Suite 400
107 West Michigan Avenue
Kalamazoo, Michigan 49007

Telephone (616) 382-1483
Fax (616) 382-1568

The Phoenix Building, Suite 500
222 Washington Square, North
Lansing, Michigan 48933

Telephone (517) 485-1483
Fax (517) 485-1568

The Creve Coeur Building, Suite 200
321 Liberty Street
Peoria, Illinois 61602

Telephone (309) 672-1483
Fax (309) 672-1568

JOHN W. ALLEN *
KELLY A. ALLEN
GUSTAF R. ANDREASEN
WILLIAM G. ASIMAKIS, JR.
DANIEL L. BAKER
GERRY A. BARTLETT
ROBERT C. BECK
ANTOINETTE BEUCHE
ROBERT L. BIEDERMAN *
MIRIAM BLANKS-SMART
LORI B. BOBBITT
WALTER J. BORDA
ERIC E. BREISACH
NORMAN BRISTOL *
PHILIP T. CARTER
JEFFREY P. CHALMERS
TODD D. CHAMBERLAIN
MICHAEL L. CHOJNOWSKI
KEVIN M. CHUDLER
CAROLYN M. CLAERHOUT
WILLIAM J. CLEMENS *
DAVID C. COEY
MATTHEW J. COFFEY
THOMAS L. COOPER

MICHAEL G. CRUSE
THOMAS R. CURRAN
CHRIST. DANIKOLAS
MARK A. DAVIS
DIANE M. DIETZ
WILLIAM A. DORNBOS
RICHARD O. FRIES *
JAMES H. GEARY
EDGAR G. GORDON
JOHN GERALD GLEESON *
PAUL GREEN
ROGER M. GROVES *
BRUCE R. GRUBBS
MICHELE L. HALLORAN
RICHARD L. HALPERT
PATRICK D. HANES
ELLEN M. HARVATH
JOHN G. HAYWARD
JOSEPH B. HEMKER *
FREDERICK G. HOFFMAN *
DAVID L. HOLMES
WILLIAM H. HONAKER *
JOHN C. HOWARD
TIMOTHY J. HOWARD *

DIANA M. JAGIELLA *
ROBERT B. JOHNSTON
J. MICHAEL KEMP *
DANIEL N. KING *
JON H. KINGSEPP
STEVEN C. KOHL
JAMES H. KONING
JON D. KREUCHER
PETER J. LIVINGSTON
JAMES E. LOZIER
D. CRAIG MARTIN
ROBERT F. MELONE *
ROBERT D. MOLLHAGEN *
C. DOUGLAS MORAN
LAWRENCE J. MURPHY *
THEODORE W. OLDS *
SUSAN E. PADLEY
CHARLES C.S. PARK
GARY A. PETERS *
RICHARD A. POSTHUMA
MARTHA A. PROCTOR
JEFFREY G. RAPHELSON
BRAD A. RAYLE
BRIAN J. RENAUD

DAVID E. RIGGS
BLAKE K. RINGSMUTH
JOSEPH W. SABELHAUS
LEONARD W. SACHS *
MICHAEL D. SCHLACK
DEBORAH M. SCHNEIDER
RAYMOND E. SCOTT *
RONALD M. STERN
MICHAEL V. SUCAET
THOMAS J. TALLERICO *
LAURA A. TALT
SANDRA M. TRAICOFF *
PATRICK R. VAN TIFLIN
SHAMRA M. VANWAGONER
JACQUELINE K. VESTEVICH
CINDY RHODES VICTOR
STEVEN H. WESTON
MYRA L. WILLIS
CYNTHIA F. WISNER
TIMOTHY M. WITTEBORT
KAREN V. WRIGHT *
THOMAS J. WUORI
JOHN E. YOUNG

WILLIAM G. HOWARD
(1846-1906)
HARRY C. HOWARD
(1871-1946)
WILLIAM J. HOWARD
(1904-1993)

ALL ATTORNEYS ADMITTED IN MICHIGAN,
ONLY, EXCEPT AS OTHERWISE INDICATED

* ALSO ADMITTED IN DELAWARE
* ALSO ADMITTED IN INDIANA
* ALSO ADMITTED IN NEW YORK
* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* ALSO ADMITTED IN TEXAS
* ALSO ADMITTED IN ILLINOIS
* ALSO ADMITTED IN VIRGINIA
* ALSO ADMITTED IN OHIO
* ALSO ADMITTED IN PENNSYLVANIA
* ONLY ADMITTED IN ILLINOIS
* ADMITTED TO PRACTICE BEFORE THE
PATENT AND TRADEMARK OFFICE

Kalamazoo Office
September 13, 1993

Direct Dial: (616) 382-9711

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

VIA: FEDERAL EXPRESS

**Re: Reply Comments in MM Docket 93-215; Supplement to Combined Comments
and Reply Comments; MM Docket 92-266 and MM Docket 93-215**

Dear Mr. Caton:

Enclosed for filing are the following documents:

1. Reply Comments in MM Docket No. 93-215 (1 original and 6 copies);
2. Petition to File Supplement to Combined Comments and Reply Comments in MM Docket Nos. 92-266 and 93-215 (2 originals and 6 copies); and
3. Supplement to Combined Comments and Reply Comments in MM Docket Nos. 92-266 and 93-215 (2 originals and 6 copies).

No. of Copies rec'd
List A B C D E

2415

William F. Caton
September 13, 1993
Page -2-

If you have any questions or if we can provide any additional information, please call us.

Very truly yours,

HOWARD & HOWARD

A handwritten signature in black ink, appearing to read "Eric E. Breisach", with a long horizontal flourish extending to the right.

Eric E. Breisach

Enclosures
cc: David Kinley, Esq.
\322\eebc\caton.c2

RECEIVED

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

SEP 14 1993

FCC - MAIL ROOM

In the Matter of)

Implementation of Sections of)
The Cable Television Consumer)
Protection and Competition Act)
of 1992)

Rate Regulation)

MM Docket No. 92-266
MM Docket No. 93-215

**PETITION TO FILE SUPPLEMENT TO COMBINED COMMENTS
AND REPLY COMMENTS**

The Small Cable Business Association ("SCBA") petitions the Commission for permission to file the attached Supplement to Combined Comments and Reply Comments in these dockets.

The SCBA filed Combined Comments and Reply Comments in the above-referenced dockets in which the SCBA raised justifications for certain adjustments to the benchmark rates adopted by the Commission. In its prior filing, SCBA informed the Commission that it was in the process of serving its members to attempt to quantify the amount of the adjustments.

Although the information gathering and analysis is not yet complete, SCBA has certain preliminary information which it believes will assist the Commission in not only evaluating the validity of SCBA's prior filing, but will allow the Commission to compute specific adjustments.

Therefore, SCBA respectfully requests that the attached Supplement to Combined Comments and Reply Comments be accepted and made part of the permanent record of this proceeding.

Respectfully submitted,

**SMALL CABLE BUSINESS
ASSOCIATION**

Dated: September 13, 1993

By: 
Eric E. Breisach

HOWARD & HOWARD
107 W. Michigan Ave., Suite 400
Kalamazoo, Michigan 49007

Attorneys for the Small Cable
Business Association

\\322\\cable\\scbabn.pet